

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,)
)
 v.)
)
 13) KATHRYN ZEPKA,)
 Defendant.)

Criminal No. 04-30046-MAP

SCANNED
FILED
IN CLERK'S OFFICE
2006 OCT 11 A 11:00
U.S. DISTRICT COURT
DISTRICT OF MASS.
DOCKETED

GOVERNMENT'S MOTION for DOWNWARD DEPARTURE PURSUANT to
U.S.S.G. § 5K1.1

The United States of America, by and through its undersigned attorneys, hereby moves that the Court grant the defendant Kathryn Zepka a downward departure from the sentencing guideline range established in the Presentence Report. As reasons therefore, the government states that pursuant to U.S.S.G. § 5K1.1 the defendant provided substantial assistance in the investigation and prosecution of other individuals who committed offenses against the United States.

Therefore, because of the defendant's substantial assistance the government recommends a sentence of 30 months which reflects a 20% reduction from the low end of the applicable sentencing

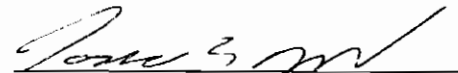
295

guideline range.

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

By:

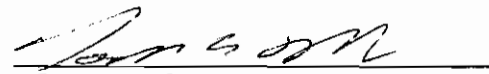

Todd E. Newhouse
Assistant U.S. Attorney

CERTIFICATE OF SERVICE

Hampden, ss.

Springfield, Massachusetts
October 11, 2006

I, Todd E. Newhouse, Assistant U.S. Attorney, do hereby certify that I have served, by first class mail, a copy of the foregoing, to all counsel of record.


TODD E. NEWHOUSE
Assistant U.S. Attorney